

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA )  
                            ) Criminal No. 11-186-S  
v.                        )  
                            )  
JOSEPH CARAMADRE        )  
                            )  
Defendant.               )

GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION  
TO ATTEND MOTHER'S FUNERAL AND WAKE

On December 2, 2013, defendant Joseph Caramadre ("Caramadre") filed a motion to be released to the custody of the United States Marshals to attend the wake and funeral service of his mother. While the United States is sympathetic to this request, we continue to assert that Caramadre poses a risk of flight and danger to the community, particularly as his sentencing date approaches. We therefore defer to the policies and procedures employed by the U.S. Marshals Service for considering inmate requests to attend the funerals of loved ones.

Respectfully submitted,

PETER F. NERONHA  
UNITED STATES ATTORNEY

/s/ Lee H. Vilker  
LEE H. VILKER  
Assistant U.S. Attorney

JOHN P. MCADAMS  
Assistant U.S. Attorney  
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Providence, RI 02903

CERTIFICATE OF SERVICE

I hereby certify that on this 3<sup>rd</sup> day of December, 2013, I caused the within Government's *Response to Motion* to be served via the Court's Electronic Filing System on:

For Joseph Caramadre:

Randy Olen, Esq.

William Murphy Esq.

/s/Lee H. Vilker

Lee H. Vilker

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